Inop ID-1500/89

2500-FM-LRWM0276 Rev. 5/99



## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date	December 7, 2005
Time Start	12:45
Time Finish	

HAZARDOUS WASTE II	NSPECTION REPORT
GENERATOR	<b>☒</b> S Q GENERATOR

Со	mpany name <u>Land &amp; Se</u>	a Forest Products Corporation 1.	D. Number <u>PAD980830863</u>
Site	e Address 400 Rock Rur	n Road Fairless Hills, PA 19030	
Со	unty Bucks	Municipality Falls Township	Zip <u>19030</u>
Na	me of Inspector Kevin B	auer, Waste Management Specialist	
Na	me & Title of Responsib	le Official <u>H. Wade Carden, President &amp; CEO</u>	
Pe	rson Interviewed <u>H. Wa</u> c	de Carden T	elephone ( <u>215) 295-5460</u>
Ma	iling Address (if differen	t from above)	
Αm	ount of Hazardous Was	te Generated per Month: to be determined Po	unds Kgs
1.	Site Characterization:		
	STORAGE: 🛛 Cont	ainer □ Tanks □ Containment Bldg. ☒ Dri	p Pad Other
	PBR:	ralization/WWTP 🔲 Reclaim	Other
	GENERATOR TREAT	MENT ☐ Containers ☐ Tanks ☐	Containment Bldg.
2.	Universal Waste:	Large Quantity Handler	Handler
	Universal Waste Ty	ypes	
3.	Hazardous Waste Tra	nsporters:	
	Transporter Name	Vernon Milling Company L	icense Number PA-AH0640
	Transporter Name	L	icense Number
	Transporter Name	L	icense Number
4.	Types of hazardous w	vaste generated and destination facility (locati	ion & type).
	Waste Code	Waste Description	Destination Facility
	F035,D004,D007	CCA sludge / solids – no longer gen.	Terra First Vernon, AL
	Non-hazardous	ACQ solids / liquid	Terra First Vernon, AL

#### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Land & Sea Forest Products Corp ID Number PAD980830863 Date 12/7/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

51	ATUS	5			PA CIT.	FED. CIT.	LINE
1	2	3_	4	REQUIREMENT	25 PA Code	40 CFR	NO.
$\boxtimes$				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
$\boxtimes$				Identification Number	262a.10	262.12	H002
$\boxtimes$				Authorized transporters only	262a.10	262.12(c)	H003
$\boxtimes$				Subsequent notification requirements met	262a.12(b)		H004
$\boxtimes$				Proper manifest used	262a.10	262.21	H005
$\boxtimes$				Manifests filled out correctly and completely	262a.20		H006
$\boxtimes$				Manifests signed and routed properly	262a.23(a)	262.23	H007
	$\boxtimes$			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
$\boxtimes$				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
$\boxtimes$				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
×				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
$\boxtimes$				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
$\square$				Specified records retained for three years	262a.10	262.40(c)	H014
	$\boxtimes$			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016
				Spill reporting procedures followed	262a.10	262.34(d)	H017
$\boxtimes$				PPC plan developed and implemented	262a.10	262.34(a)	H018
	$\boxtimes$			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	$\boxtimes$			Source reduction strategy prepared and available (LQG only)	262a.100		H020
$\boxtimes$				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

#### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date <u>12/7/2005</u> 1 - No Violation Observed 2 - Not Applicable 4 - Non Compliance 3 - Not Determined

STA	ATUS	6					
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
$\boxtimes$				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
$\boxtimes$				Containers of hazardous waste in good condition	265a.1	265.171	H026
$\boxtimes$				Containers and stored waste compatible	265a.1	265.172	H027
$\boxtimes$				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
$\boxtimes$				Containers managed to prevent leaks	265a.1	265.173(b)	H029
$\boxtimes$				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
$\boxtimes$				Container storage areas inspected at least weekly	265a.1	265.174	H031
$\boxtimes$				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
$\boxtimes$				Proper containment and collection systems in place	265a.179		H033
$\boxtimes$				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
$\boxtimes$				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 12/7/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3		4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.	
	_			Containment Buildings (Subchapter T)			
	Ø			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	$\boxtimes$			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	$\boxtimes$			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	Ø			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	Ø			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	×			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	$\boxtimes$			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	$\boxtimes$			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
ļ				Drip Pads (Subchapter S)			
X				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
$\boxtimes$				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
$\boxtimes$				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
$\boxtimes$				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
$\boxtimes$				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
$\boxtimes$				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
$\boxtimes$				Release reporting requirements met	265a.1	265.443(m)	H076
$\boxtimes$				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

ER-WM-129: Rev. 7/95

### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection December 7, 2005 Identification Number	
Company/Facility/Site Land & Sea Forest Products Corporation ("Le	and & Sea")
A routine hazardous waste generator inspection of Land & Sea Forest Products of located in Falls Township, Bucks County was conducted on December 7, 2005, by Mr. H. Wade Carden, Jr. (President / CEO) was present for the facility. The following of the facility.	Kevin Bauer of the Department.
1. Operations at the facility were discussed. As noted during the Department's precased the production of treated lumber utilizing CCA (Chromate copper arsenate) in Defind storage tanks were power washed, and all liquid and solids were removed and drumn (F035). The facility now utilizes ACQ (Ammonia copper quaternary) for the treating of handling the drums of ACQ contaminated material as a hazardous waste. As noted after waste ACQ solids / liquids do not need to be handled as a hazardous waste. The pad, surpower washed, and under option 3 – phased closure of a USEPA technical guidance for chosen by Land & Sea), the resultant waste generated after the cleaning of the pad does recommendate the surpower waste. It is now a residual waste. If Land & Sea would like to handle it should work with its waste disposal company (Terra First) on recharacterizing the was	cember 2003. The drip pad ned as a hazardous waste lumber. Land & Sea has been the previous inspection, the mps, and equipment were closure of a CCA pad (option not need to be handled as a the ACQ as a residual waste,
2. In the meantime, Land & Sea has been drumming any solids generated by the drum as a hazardous waste.	ACQ process and labeling the
3. Land & Sea has been completing weekly drum storage and pad inspections. E as a residual waste, Land & Sea should continue with the operation, inspection, and main pads. The facility should continue to ensure that the pad inspections are completed week inspector when the primary is not available.	ntenance requirements of drip
4. An engineer has requested that two small areas of the pad be resealed before the completed. Upon sealing of the pad, which will occur when there is a warm stretch of we will complete an inspection and certification of the pad.	
5. To date (2005), Land & Sea has shipped 600 pounds of waste ACQ solids. V waste to Terra First of Vernon, AL.	/ernon Milling transports the
This inspection report is notice of the findings of an inspection conducted Department. This report is formal notification of any violations observed during Additional notification of violations may be issued concerning either violations violations identified as a result of review of laboratory analyses or Department. This report does not constitute an order or other appealable action of the local contained herein shall be deemed to grant or imply immunity from legal action for herein.  Signature by the person interviewed does not necessarily imply concurrence report, but does acknowledge that the person was shown the report or that a copy	g the inspection. noted herein, or other records. Department. Nothing r any violation noted with the findings on this
Person interviewed (signature) Muld Luhu	Date 12/1/05
Inspector (signature) Ferri C Baway	Date 12/7/05
	FF

2500-FM-LRWM0276 Rev. 5/99



#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date	October 19, 2004
Time Start	13:55
Time Finish	

### HAZARDOUS WASTE INSPECTION REPORT GENERATOR S Q GENERATOR

Со	mpany name <u>Land &amp; Se</u>	a Forest Products Corporation I	D. Number <u>PAD980830863</u>
Site	e Address <u>400 Rock Rur</u>	Road Fairless Hills, PA 19030	
Со	unty Bucks	Municipality Falls Township	Zip <u>19030</u>
Na	me of Inspector Kevin B	auer, Waste Management Specialist	
Na	me & Title of Responsib	le Official <u>H. Wade Carden, President &amp; CEO</u>	
Pe	rson Interviewed H. Wad	de Carden, Zack Ryan Crunkleton 1	elephone (215) 295-5460
Мa	iling Address (if differen	t from above)	
Αm	ount of Hazardous Was	te Generated per Month: to be determined Po	ounds Kgs
1.	Site Characterization:		
	STORAGE:	ainer 🗌 Tanks 🔲 Containment Bldg. 🔀 Dri	p Pad Other
	PBR: Neut	ralization/WWTP 🔲 Reclaim	Other
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks ☐	Containment Bldg.
2.	Universal Waste:	Large Quantity Handler Small Quantity I	Handler
	Universal Waste T	ypes	
3.	Hazardous Waste Tra	nsporters:	
	Transporter Name	Vernon Milling Company L	icense Number <u>PA-AH0640</u>
	Transporter Name	L	icense Number
	Transporter Name	L	icense Number
4.	Types of hazardous w	vaste generated and destination facility (locati	on & type).
	Waste Code	Waste Description	Destination Facility
	F035,D004,D007	CCA sludge / solids – no longer gen.	Terra First Vernon, AL
	F035?	ACQ solids / liquid	Terra First Vernon, AL
		4	

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Land & Sea Forest Products Corp ID Number PAD980830863 Date 10/19/2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

**STATUS** 

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
$\boxtimes$				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
$\boxtimes$				Identification Number	262a.10	262.12	H002
$\boxtimes$				Authorized transporters only	262a.10	262.12(c)	H003
Ø				Subsequent notification requirements met	262a.12(b)		H004
$\boxtimes$				Proper manifest used	262a.10	262.21	H005
$\boxtimes$				Manifests filled out correctly and completely	262a.20		H006
$\boxtimes$				Manifests signed and routed properly	262a.23(a)	262.23	H007
	$\boxtimes$			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
$\boxtimes$				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
$\boxtimes$				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
$\boxtimes$				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
$\boxtimes$				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
$\boxtimes$				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
$\boxtimes$				Specified records retained for three years	262a.10	262.40(c)	H014
	$\boxtimes$			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016
$\boxtimes$				Spill reporting procedures followed	262a.10	262.34(d)	H017
$\boxtimes$				PPC plan developed and implemented	262a.10	262.34(a)	H018
	$\boxtimes$			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	$\boxtimes$			Source reduction strategy prepared and available (LQG only)	262a.100		H020
$\boxtimes$				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

#### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 10/19/04 3 - Not Determined

1 - No Violation Observed 2 - Not Applicable

4 - Non Compliance

#### **STATUS**

4	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
<u>'</u>	_	3	-	CONTAINERS (Subchapter I)	2017 0006	40 07 10	1.0.
$\boxtimes$				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
$\boxtimes$				Containers of hazardous waste in good condition	265a.1	265.171	H026
$\boxtimes$				Containers and stored waste compatible	265a.1	265.172	H027
$\boxtimes$				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
$\boxtimes$				Containers managed to prevent leaks	265a.1	265.173(b)	H029
$\boxtimes$				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
$\boxtimes$				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
$\boxtimes$				Proper containment and collection systems in place	265a.179		H033
$\boxtimes$				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
$\boxtimes$				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
$\boxtimes$				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
$\boxtimes$				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 10/19/04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

#### PILITATE

STA	ATUS	,			PA CIT.	FED CIT.	LINE
1_	2	3	4	REQUIREMENT	25 PA CODE	40 CFR	NO.
		ļ		Containment Buildings (Subchapter T)			
	$\boxtimes$			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	$\boxtimes$			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	$\boxtimes$			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	$\boxtimes$			evel of hazardous waste within unit is below containment alls		265.1101(c)(1) (ii)	H064
	$\boxtimes$			racking of waste out of unit by equipment or personnel 265a.1		265.1101(c)(1) (iii)	H065
	$\boxtimes$			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	$\boxtimes$			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	$\boxtimes$			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
L							
			<u> </u>	Drip Pads (Subchapter S)			1
		$\boxtimes$		Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
$\boxtimes$				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
$\boxtimes$				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
$\boxtimes$				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
$\boxtimes$				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
$\boxtimes$				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
$\boxtimes$				Release reporting requirements met	265a.1	265.443(m)	H076
		$\boxtimes$		Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

ER-WM-129: Rev. 7/95

### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection October 19, 2004 Identification Number PAD980830863

Company/Facility/Site Land & Sea Forest Products Corporation ("Land & Sea")
A routine hazardous waste generator inspection of Land & Sea Forest Products Corporation ("Land & Sea") located in Falls Township, Bucks County was conducted on October 19, 2004, by Mr. Kevin Bauer of the Department. Mr. H. Wade Carden, Jr. (President / CEO) and Mr. Zach Crunkleton were present for the facility. The following observations were noted:
1. Operations at the facility were discussed. In December 2003, the facility ceased the production of treated lumber utilizing CCA (Chromate copper arsenate). The drip pad and storage tanks were power washed, and all liquid and solids were removed and drummed. In March 2004, twenty-five (25) drums of CCA waste (F035) were manifested off-site to Terra First of Vernon, AL.
2. The facility now utilizes ACQ (Ammonia copper quaternary) for the treating of lumber. Since the changeover, the facility has shipped drums of ACQ contaminated material two times. In June 2004, two (2) drums – 300 pounds and in September 2004, 500 pounds were shipped to Terra First. The waste ACQ does not appear to be classified characteristically or by listing as a hazardous waste but has been shipped as F035 due to the fact that the pad has not been officially closed according to 40 CFR 265.445. The pad was power washed but no confirmatory sampling of the pad or subsoils occurred. The Department will research this issue. Land & Sea should still complete a waste determination on the waste ACQ to ensure that it does not meet any of the characteristics. A copy of the MSDS for Osmose NW 100-C (ACQ) was obtained.
3. The treatment (autoclave) and storage tank room as well as the drip pad were inspected. The entire operation is under roof and is contained. Drippage from the operation is collected in sumps and pumped into the storage tanks for reuse. Solids collected from the drip pad and sumps are drummed for disposal. On the pad, there was a small area that needed repair. There were no drums containing waste at the time of the inspection.
4. The Department will research details concerning the requirements for the official closure of the pad (see the Department's March 16, 2004 letter to Land & Sea). In the meantime, Land & Sea should be conducting weekly inspections of the drip pad and have it certified annually by a professional engineer registered within PA.
5. The facility's training program, PPC information and procedures, drip pad inspections, old engineer certifications, and manifests were reviewed.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection.  Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Lahleen Laftus Date 10-22-04
Inspector (signature) Func Bauer   Date 10/17/04
Page $5$ of $6$

ER-WM-129: Rev. 7/95

### Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection October 19, 2004 Identification Number PAD98083	30863
Company/Facility/Site Land & Sea Forest Products Corporation ("Land & Se	ea")
6. The facility is currently listed by the USEPA as a LQG of hazardous waste but recently September 13, 2004 as a SQG. As of October 13, 2004, the USEPA database (RCRAInfo) did no status. The Department will look into this. If the ACQ waste is non-hazardous, Land & Sea may a CEG or as not generating.  7. The facility generates waste oil, which is stored in a tank within a contained building.	ot have the updated be able to renotify as
labeled as "used oil". Waste Zep DynaClean II (parts washer) also generated at the site is handled waste. An updated MSDS should be obtained.	as a non-hazardous
Within fourteen (14) days of the receipt of this report, Land & Sea should submit a schedule what actions will be taken to address above noted issues.	ule and plan detailing
This inspection report is notice of the findings of an inspection conducted by a report pepartment. This report is formal notification of any violations observed during the inspectional notification of violations may be issued concerning either violations noted her violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department contained herein shall be deemed to grant or imply immunity from legal action for any violations.	pection. rein, or other t. Nothing
Signature by the person interviewed does not necessarily imply concurrence with the report, but does acknowledge that the person was shown the report or that a copy was left	
Person interviewed (signature) Jakeles Laftus Date_	10-22-04
Inspector (signature) FUM C Brues Date	10/17/04
	Page 6 of 6



	_	· washing	1
Inspection Date	8	25	03
Time Start	$\perp$	:00	ρM
Time Finish	4	100	OW

HAZARDOUS WASTE INSPECTION REPORT

☐ S Q GENERATOR

	Ko-A		Array or our d		
		1 & Sua Forest			
Sit	e Address <u>L100</u>	RUCK RUD I	Read, Fair	less Hills.	nerim der er 15km fragstaf kommendigsverska blinderne vind som brusska frakti den er
Co	ounty <u>BUCKS</u>	Municipality	Talls Tap	Zip 19	030
Na	me of Inspector	Ven Vierreite	<sub>gar</sub> age. Krigaria da a di magri mananan krigan <del>mahada an</del> alanga saka da da ana analanga saka sa sa sa sa sa sa sa sa sa	etillismus makken sin eseksine dekelikasa. Her senem tiraksalada gangen da Helissandi kati Yeyinskal	Statinunketin 1980, straliktööttä 1. 1885,killa järsen taalla säällä järsen sa muuniuk.
Na	me & Title of Responsib	le Official H. Wade	Carden,	Jr. > Presid	tent of CEO
Pe	rson Interviewed	ove & Grange Kite	T	elephone ( <u>215</u> ) <u>¥ 2</u>	95-5460
Ma	ailing Address (if differen	t from above) <u>U / EQ vine</u>	<u> </u>		
Αn	nount of Hazardous Was	te Generated per Month:	Po	unds	Kgs
1.	Site Characterization:	:			
	STORAGE: 🗵 Con	tainer 🗌 Tanks 🔲 Cor	ntainment Bldg. 🗵 Drip	Pad Other	
	PBR: Neu	tralization/WWTP	claim	Other	
	GENERATOR TREATI	MENT Containers	☐ Tanks ☐	Containment Bldg.	Drip Pad
2.	Universal Waste:	Large Quantity Handler	Small Quantity H	andler	
	Universal Waste T	ypes			
3.					
	Transporter Name	Vernon Million	i Company L	cense Number PA	-AHCLOYO
				cense Number	
				cense Number	
4.	Types of hazardous v	vaste generated and destin	nation facility (locatio	n & type).	
	Waste Code	Waste Desc	ription	Destination	Facility
	FESS	We work Soll	d	Terra Fire	st-Al
		JADONE Ch	minium)	Strugge	operations
				30,300	Fuestig
	Fu35	haz waste lie	and	Vernon, Al	35592
		LACKOLE COM	•	205-698	
		111111111111111111111111111111111111111	VIII (LIV)	200 011	, , , , ,

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name 1-000 Sca ID Number 1-No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

ST	ATUS	3			DA CIT	EED OIT	1 1815
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
$\boxtimes$				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
$\boxtimes$				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
Ø				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	<b>X</b>			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
			X	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
$\boxtimes$				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
$\boxtimes$				Specified records retained for three years	262a.10	262.40(c)	H014
		X		Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016
$\boxtimes$				Spill reporting procedures followed	262a.10	262.34(d)	H017
		X		PPC plan developed and implemented	262a.10	262.34(a)	H018
M				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
			$\boxtimes$	Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
	П	П	П				

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	LandtSea	ID Number	PAD980830863	
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance
STATUS				

STA	STATUS							
				DECUMPENT	PA CIT.	FED CIT.	LINE	
1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.	
				CONTAINERS (Subchapter I)				
				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025	
X				Containers of hazardous waste in good condition	265a.1	265.171	H026	
区				Containers and stored waste compatible	265a.1	265.172	H027	
×				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028	
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029	
×				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030	
			$\boxtimes$	Container storage areas inspected at least weekly	265a.1	265.174	H031	
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032	
$\boxtimes$				Proper containment and collection systems in place	265a.179		H033	
$\boxtimes$				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034	
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035	
			図	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036	
			図	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037	

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site <b>Na</b> me	Land a Sea	ID Number	PADGECESORIO	3 Date Aug 25,2003
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STA	ATUS				DA CIT	EED OF	
1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	X			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	[S]			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	区			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	区			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	Ø			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	図			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	Ø			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
-	<del> </del>			Drip Pads (Subchapter S)			
X				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
囟				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
Ø				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
X				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
$\boxtimes$				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
$\boxtimes$				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
X				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
区				Release reporting requirements met	265a.1	265.443(m)	H076
X				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

Date of Inspection Aug. 25, Dus Identification Number PHD9806308163
Company/Facility/Site Name Land & Sea Forest Products
a hazardous wrote generator inspection was
Conducted by Chen Minneyer, Solid waste Specialist
for the Department Present for the facility was
Mr. George Kite, treater, and Mr. H. Wlade Carden, Je
president and CEO.
The facility pressure treats wood/ humber with
(CA (Chromium, Copper & Arsenic), this chemical
will notonger be used after Dec. 2003 due to
Federal regulations. Most waste that is generated
Will no longer be used after Dec. 2003 due to federal regulations. Most waste that is generated on-site is from debris falling into the pit area
under the machines. Liquid hazardous waste is
generated from alean outs of the tounks.
a site walk over was conducted. The waste Strage
aua was observed. Drums staring wrote
were not labeled and did not have the contents
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall
be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) gatileen tofties Date 3/28/03
Inspector (signature) West A Deemeyer
Page <u>5</u> of <u>8</u>

Date of Inspection	Ally 25,2003	Identification Number $100$	980830863
	ite Name Land 1 Ja		
	ely identified.	The state of the s	
Observed.	Mc Canden ex	plained That a	Her being
Treasted	the lumber with	1 Set in this	area for
	is before been		
	pad area hav		
	area. Mr. Carder		
Hu Stin	no in this are	a pump and	, liquid
back L	nto the Storage pressure treating	tounks to be	re-used
in the	pressure treating	of process.	
	/		
Paperwer	L Was reviewe	d. The facility	notified_
	Aug 30, 2001 as		
generation	- of hazardows u	saste, It lanifest	k weig
	ed. The famility P		
	wooff-site of the		
	200 pounds. The t		
Imagi	ncy plans, howen	er they do not	have a
This inspection in report is formal notifical concerning either violed Department records.  This report does be deemed to grant or Signature by the	report is notice of the findings of an inspentation of any violations observed during the lations noted herein, or other violations is not constitute an order or other appeals imply immunity from legal action for any view person interviewed does not necessarily	ection conducted by a representative of inspection. Additional notification of a identified as a result of review of able action of the Department. Nothin violation noted herein.  It imply concurrence with the findings	of the Department. This violations may be issued laboratory analyses or ng contained herein shall
acknowledge that the p	person was shown the report or that a co	py was ieπ with the person.	and the same of th
Person interviewed (	(signature) X4 taleer tog	ttus Date_	<u>8/78/03</u>
Inspector (signature)	(her Ar) in	neger	t
	,	U ·	Page <u>&amp;</u> of <u>&amp;</u>

Date of Inspection Aug. D5, Dws Identification Number PHD950980803
Company/Facility/Site Name / And dela
PPC plan developed. The facility does not have
a Source reduction Strategy
Violations are an follows:
1) Inspection log for wask storage was not up-to-dak
71his is auntrary 10 CFR 265.174
a) Waste drums did not have and a label with
The accumulation date, "Hazardius Wask" or
Contents identified. This is contrary to
40 (FR 262. 34(a)(2), 40 CFR 262.34(a)(3) and
Solid Waste Maragement Act 6018 403 (b)(2).
XX These Violations were corrected at the time
of this enspection.
3) The facility dues not have personnel trained
yearly. This is Contrary to 40 CFR 262.34(a)(4) 1(d)
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall
be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person Interviewed (signature) Jake Joftus Date 3/28/03
nspector (signature) Their Al Disneyr
Page <u>7</u> of <u>8</u>

Date of Inspection Hug 25, 2003 Identification Number PHD98083080  Company/Facility/Site Name LAINA & JOA	3_ 
4) The facility does not have a Source Reduction Strategy. This is constrary to 25 Por Octob 2	<u>n</u> 1 <u>62a</u> . 16
3 violations outstainling.	
Results of this inspection were discussed with Kathy Loftus byere leaving the fac	"ility:
Copin of the regulations and SRS manual, PPC plan manual and other compliance quid were left on-site during this inspection.	les
This inspection report is notice of the findings of an inspection conducted by a representative of the Department report is formal notification of any violations observed during the inspection. Additional notification of violations may be concerning either violations noted herein, or other violations identified as a result of review of laboratory analyst Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but acknowledge that the person was shown the report or that a copy was left with the person.	issued ses or in <b>s</b> hall
Person interviewed (signature) 994166 Foftus Date \$ \frac{3803}{03}  Inspector (signature) Min Allen Foftus	3
Page $\underline{\mathscr{G}}$ of	1 <u>8</u>

				<i></i>	54
CAIT DV	8-29- 1 ;10:	26AM ; D.	AN RAVIV ASSO	C. → 16092754511	1209 T
EPA Form 7702-12 before		te Activ	ity		Official Use 2
information requested here is					SEP
Recovery Add		Environmental Pro	otection Agency	4 Cas	Pera Ony
I. Installation's EPA ID Number (Mark	X' in the appropriate	box)			No. of the second
	Subsequent Notifi		C. Installe	tion's EPA ID Number	
	(Complete Item C)		PAD9	8 0 8 3 0	8 6 3
il. Name of Installation (Include compa	ny and specific site	name).	Carlotte Carlotte		18.
Landland	S e a   F	ore	stlp	roduc	ts
III. Location of Installation FPhysical Vic	भित्रा के जिल्हें के स्टेस	of Route Numb	er)		
Street					A STATE OF THE PARTY OF THE PAR
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Street (Continued)				# - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	
City or Town			State Zi	Code	
Falirless		s	PA 1	9 0 3 0 -	
County Cade County Name			· · · · · · · · · · · · · · · · · · ·	A Company of the Comp	
0 1 7 B u c k s					
IV. Installation Malling Address (See	instructions)	3	100	en garages de la companya de la comp	
Street or P.O. Box che: Lewis Co	oldshore, Esq.	<b>研究的</b>	THE EAST	Andrew Control of the	
101 Grove	rsM	1 1 1	R o a d	Suit	e 1 0 4
City of Town			State 2	p Code	
Lawrencev	1 1 1	1	N T O	8 6 4 8 -	-
V. Installation Contact (Person to be	contacted regardin	g waste activitie	s at sita)		
Name (Last)		(First)			
C a r d e n	TITI	H	Wade	TTTTT	
Job Title		Phone	W la   a   e   Number (Ares C	ode and Number)	and and the color of the section of
President		160	9 - 2 3	-   9   1	Ext:
VI. Installation Contact Address (Sec	e Instructions)		FA		9171 9171
A. Contact Address Location Malling B. Street or P.	O. Box	Commence of the second	1944 - 1955 - 19	19.2	
City or Town			State	Ip Code	den verse de la companya de la comp
					- 1
VII. Ownership (See instructions)		La partie de la companya del companya del companya de la companya	The second section	A STATE OF THE STA	
A. Name of Installation's Lagar Owner				· · · · · · · · · · · · · · · · · · ·	
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			* * * .
	•		

EPA Form 8700-12 (Rev. 12/99)

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

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SZAFERMAN, LAKIND, BLUMSTEIN, WATTER, BLADER, LEHMANN & GOLDSHORE, P.C.

ATTORNEYS AT LAW

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Quakerbridge Executive Center, Suite 104 101 Grovers Mill Road Lawrenceville, New Jersey 08648 Tel: 609.275.0400 Fax: 609.275.4511 www.szaferman.com

August 30, 2001

Cathyange Pisciotta-Goldberg\*
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Affile C. Kalac
Janine R. Danks\*
Caitlin L. Aviss
Allison Anderson Acevedo\*

\*NJ & PA Bars
\*\*NJ & NY Bars
J,NY & PA Bars

via Certified Mail/RRR

USEPA/RCRA Program 841 Chestnut Street Philadelphia, PA 19107

> RE: Land and Sea Forest Products of Pennsylvania Corporation Notification of Regulated Waste Activity

To Whom It May Concern:

Enclosed, please find, a Notification of Regulated Waste Activity form for the above referenced Corporation.

Should you wish to discuss this matter in greater detail, please feel free to contact me.

Very truly yours,

LEWIS GOLDSHORE

Encl.

LG/tav

ER-WM-312: Rev. 1193

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT - HAZARDOUS WASTE SMALL QUANTITY GENERATOR

Site	I.D.		PA	D980830863	Telephone # \\ \\ \(\frac{\beta(5)}{2}\)	295-546	0	
Site	Nai	me	00	morn neglth Word Preserver Inc.	Operator Name			
Add			40	O Rock Run Rd	Address			
		/	-11	cless Hills, PA 19230				
Mur	nicip	palit	y _	Falls Tup	County Bucks			
Resp	ons	sible	Off	icial <u>David Van Bramer</u>	Title Manager			
Pers	on I	nter	viev	ved David Van Braner	Title			
Insp	ecto	or _	$\bot$	hris Smiler	Time 10:53 ak			
9	)ue 1	Date	1	Inspection Date Inspection Type	Facility Type Insp	ector ID #	Violation	
				vastes transported off-site by this generator? mber(s) and expiration dates of transporter(s)	<del>_</del> , ,	ALD98	102349	
			1-1	lo Violation Observed 2-Not-Applicable	3-Not-Determined 4-No	n-Compliance		
1	STA 2	TUS 3	4	REQUIREMENT		CHAPTER CITATION	LINE NUMBERS	
X				Amount of wastes generated per month is within small quantity  generator limits. Average waste generated monthly 1000 lbs				
$\times$				Amount of waste accumulated is within small	I quantity generator limits	261.5(d)	H492	
X				Hazardous waste determination (262.11)		261.5(g)(1)	H493	
X				Records of quantities, descriptions and dispo- for five years and furnished to the Department	sitions of all wastes retained nt upon request	262.11(d)	H494	
X				Storage within time limit specified (261.5(d))		261.5(g)(2)	H495	
X				Manifest system used for off-site transport		262.20(a)	H496	
261.5	5 In	dica	te b	elow the method of handling of the waste:				
	_		a.	Treatment or disposal at permitted on-site f	facility.			
				Permit Number		reatment	Disposal	
	b. Delivered to a PA haz. waste facility. Name of facility:							
	_		c.	Delivered to a PA municipal or residual facil	lity with Form S approval. N	ame of facility.		
	d. Delivered to an approved out-of-state facility. Name of facility. Terra First  Alabama					st		
	_		e.	Delivered to a reclamation, reuse, or recycle	e facility. Name of facility:			



ER-WM-129: Rev. 10/96

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Date of inspection 12/18/96 Identification Number PAD9& 830 863
Company/Facility/Site Name Connuncealth Wood Preservers
A coutine squall quantity hazarders waste inspection was conducted at Commonwalth word Preserve
inspection was conducted at Commonwealth wood Present
Present during the inspection were Chris Smolar of the
Present during the inspection were Chris Smelar of the Department and David Kan Braner of Commonwealth Wood Procenuers
The hozardous waste generation and storage areas
were examined. The lumber is preserved with certain charicals
The wastes generated by this process are Chromium Copper, and
Arsenic. There are generated in the form of scrapings from the pressure treater, and processed liquids which undergo water treatment. A filter cake containing chromium, copper,
The pressure treaten and processed liquids which underge
water treatment. A tilter cake containing chromium, copper,
and arsenic is generated. The flinds which comprise
the liquid to be treated are the excess liquide which drip
from the pressure treater, and from the drip pad where the
The regards for the facility were examined and
tound to be in order. The facility has regular manites
for shipments which are generated every 90 days None
et the chiquents recorded for 1996 exceed 2311/bsN: Violations were observed.
-N: Violations were observed.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal
notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.
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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Date
Inspector (signature) Mistoria Amola Date 12/18/96
Page $ $ of $ $

	HAINTENANCE FO	DATA HANAGENEUT SYSTEM ORN FOR NOTIFICATION
EPA-ID +	f A) 980830 Commor	863 Dates 12/28/89
FACILITY N	ME Commor	revealth Wood haven
New Tacili	ty Name	
Consact Pe	rean/Poettion AR/	Op. NGR. 315,295 5460
(Last ,	first, H)	1110 101 101 101 5460
Mailing Address	cier Hampt	on June Vario 2366/
LOCATION ADDRESS	Street	· .
	CIFA	
County Nes	<b></b>	County Code
Ovner Name		Operator Name
Activity Gen S. Na Activity Gen	Code Tr Tod rket er Sura HWF Gea Wark to Sura Other Marketer Suraer	Ged Gil Fuel Activities  6. Off-Spec Ged Gil Fuel  A. Gen Hark to Surn  B. Other Harketer  C. Surner  7. Spec Ged Gil Fuel Hark
Waste Fue	l Burning: Tree of C	leabustics Device , Ind. Boiler Ind. Furnace
Mode of T	resempristion (Transp Roil High	wer Water Other
Hainteha	aco Screens	
Existing Weste Code	Vi Card New Yeste Cade	12 Card  100/ Man-Roy Ind(e303)

Common Lealth
96608 30 8 30 18Tpp 32
Please print or type with ENTE type (17 characters per inchin in unstabled deas only  United States Environmental Protection Agency  Please reler to the Instructions of Environmental Protection Agency
SEPA Notification of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection Section of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of Hazardous Waste Activity  Filing Notification before complete this form. The Information request here is required by law ISection of the Information request here.
For Official Use Only
2 2 Comments
20 c
Installation's EPA ID Number  Approved (yr. ma. day)
0 1911-101-101-13-08-93 BUCK
I. Name of Installation
Unstallation Mailing Address
Street or P.O. Box
#35604 CVAV CINE AVE
State ZIP Code
III. Location of Installation
Streetor Route Number
100 KOCK 5400 KOCK 10000
10 19 19 Code 10 19 19 03
IV. Installation Contact   Name and Title (last, first, and job title)   Phone Number (area code and number)
CARL SETTLE OP MGR 2152955460
V. Ownership
A. Name of Installation's Legal Owner.  B. Type of Ownership Jenter code
VI. Type of Regulated Waste Activity (Mark X' In the appropriate boxes. Refer to instructions.)
A. Hazardous Waste Activity 2018 2017 2017 10 B. Used Oll Fuel Activities
☐ 1s. Generator ☐ 1s. Less than 1,000 kg/mo. ☐ 6, Off-Specification Used Oil Fuel ☐ 2. Transporter X' and mark appropriate boxes below)
☐ 3, Treater/Stoler/Disposer 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/ 3/
6: Market or Burn Hazardous Waste Fuel (C. Burner) C. Burner
■ a. Generator Marketing to Burner  Who First Claims the Oil Meets the Specification
VII. Waste Fuel Burning: Type of Combustion Device/enter X in all appropriate bases to indicate type of combustion device/allo
VII. Waste Fuel Burning: Type of Combustion Device (enter X' in all appropriate boxes to Indicate type of combustion device(s) in which hazardous waste fuel or off-specification used pilituel is burned. See instructions for definitions of combustion devices.)   A. Utility Boller  Bindustrial Boller  C. Industrial Furnece
VIII. Mode of Transportation (transporters only — enter X in the appropriate box(es)
A. Air . B. Rail , C. Highway D. Weter E Cther/specify)
IX. First or Subsequent Notification  Mark 'X' in the appropriate box to indicate whether this is your installation affirst notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.
C. Installation's EPAID Number
A. First Notification B. Subsequent Notification/complete ilem C/ PAD983083086

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1875 New Hope Street Norristown, PA 19401 215-270-1948 (GEN (G))

March 7, 1989

Commonwealth Wood Preservers of PA, Inc. 400 Rock Run Road Penn Warner Park Fairless Hills, PA 19030

Attention: Carl Settle, Operations Manager

Re: Hazardous Waste Inspection PAD 980 830 863 Falls Township Bucks County

Dear Mr. Settle:

#### NOTICE OF VIOLATION

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(e)(7) - The facility generates a dry, solid waste. Manifests are currently being incorrectly completed. The quantity of waste is being listed as gallons. The drums should be weighed and the weight of the drums recorded on the manifest.

A facility that generates small quantities of wastes per month (less than 1000 kg per wonth), but accumulates and ships over 1000 kg of waste must still comply with the Large Quantity Generator Regulations in Pennsylvania. Some of these requirements are manifesting in the waste, filing quarterly reports with the Department, and preparation of a PPC Plan. Commonwealth Wood Preservers should limit waste shipments to 1000 kg or less to avoid additional requirements.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

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Commonwealth Wood Preservers of PA, Inc. March 7, 1989
- 2 -

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

ROBERT F. FULTON Waste Management Specialist

cc: Compliance
Div. of Compliance and Monitoring

\*PA
Ms. Kurtz
Falls Township
Re30 SW060.12

## Pennsylvania Department of Environmental Resources Bureau of Waste Management

## Hazardous Waste Inspection Report Generators — Part A



EPA

		1/00	, ,			
Date of inspect	on	17/89	Time start	<i>700</i> Tin	ne fic:	sh <u>///00</u>
Name of inspec	4.00	KOBERT	FULTON!			
Company, insta	ation name	Commonwo	ALTH WOOD.	PRESERVERS OF	= //	tuc
Location	100 Ra	K KUN K	D, PENNWA	RIVER PARK	<u> </u>	LLESS HILLS PA 19030
County	Bucks	<u> </u>	•	pality <u>FAL</u>		_
Identification n			30 8 <b>30</b> 86	3		
Name of respon	ible officia	al CARL	SETTLE			
Title	PELAT	ous Ma	2			
Mailing address		SAME A	6-ABOVE			
Area code and	elephone n	umber	15-295-	5460		
Name of person		1	L SETTLE	_		
Title	<b>78</b> %	5,	2			
***	100	t from above)	<i>[</i> (			
- 7			И			
1. Current was	te handling	method:				
a. G	On-site	$\Box$ treatment,	$\square$ stor <b>ag</b> e,	disposal	ĺ.	PB <b>R</b>
<b>b.</b> C	On-site	□ use,	□ reuse,	re <b>cycle,</b>		reclaim
c.	Off-site	$\square$ treatment,	□ storage,	disposal		
d. 📮	Off-site	use,	□ reuse,	⊂ recycle,	[	reclaim
2. Amount of						
	azardous v	vaste produceu: 344	ka f	<b></b>		6.
a		4130	kg./r			
D			kg./y	yr.		
3. Types of h	<b>ka</b> rdous wa	iste produced by Ha	zardo <b>u</b> s <b>Waste</b> Num	ber:		
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## Pennsylvania Department of Environmental Resources Bureau of Waste Management

# Hazardous **Waste** Inspection **Report**Generators — Part B

		1-4	Viol	lation Observed 2—Not Applicable 3—Not Determined	4—Non-Compliance
		etus		REQUIREMENT	Chapter Citation
1	2	3	4		75.262
X			9	Hazardous waste determination, copies available	(b)
X			e S	Identification number	(c)(1)
X			(K.)	Hazardous waste shipments offered only to licensed transporters	(c)(4)
				Authorization received from TSD facility for wastes shipped off-site	(d)
	X			PA manifest used for intrastate shipments	(e)(2)
1				Disposer state manifest or EPA format manifest used for out-of-state shipmonts	(e)(3)
			X	Manifests filled out properly and completely	(e)(7)
X				Manifests routed properly and within time limits (7 days)	(e)(14) or (15
		X		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
7				Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
7	X			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
		X		Placards offered to transporter	(f)(2)
		X	The second	Wastes accumulated on-site for less than 90 days	(g)(1)(i)
7				Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
7				Containers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
				Records retained at designated location for 20 years	(h)
		X		Quarterly reports submitted to the Department	(i)
		X		Exception reporting procedures followed	(j)
	,	X		Hazardous waste disposal plan, if required	(1)
	7			Spill reporting procedures followed	(m)(1)
	- 5	X	(A)	Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
		X		Special requirements followed for international shipments	(0)
		$\times$		On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
				Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)
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#### Commo**nwealth** of Pennsylvania Department of Environmental Resources Bureau of Waste Management

## Inspection Report Comments

	-1-189	700 070 017
Date of Inspection	$\frac{2/7/89}{}$ Identification Number $\frac{24}{}$	100 8.50 86.5
Company/Facility/S	Name Comm. WOOD PRESERVERS OF PA,	UC.
En	0	
296	PRODUCES PRESSURE TREATED WOO	=1-11-
7.700	CARL SETTLE CONDUCTED TOUR OF	
	15 DRY FICTER CAISE CONTAININ	
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OF HAR	ARDONS WASTE. HOWEVER, FACILI	of 15 HELDWINGSTIN
GREATER	THAN 1000 KG AND MAKING (1	GE QUANTITY
SHIPMEN	75. (1.E. 2660 KG, AUD 1470 KG IL	10/88 AND 5/88 PEG
BECAUSE	FACILITY IS WAKING LAKE QUILL	1 Shipmanis
MUST C	mony w/ BESS IN 75.262 AND.	mpr/ w/ 90
	LAGE REQUIREMENTS, QUATERLY TO	
	ON ETC. FACILITY CAN ANOIN	
GENERAT	R PROVINCEMENT, BY MACING SA	DIMENTS OF
1000 KG		
	NIFESTS ARE CONSONTLY BEING	LLED OUT
MILOPER	LY. The WT/VOL. BOX 13 BEING	LABELLEIS AS
. /	This Should BE CHANGED TO	-
	MES AS MATE 15 DRY.	
	O. FACILITY MADE A ShipMENT	IT WASTE LAUND
From +	<b>1</b>	TANK BOTTOM.
its correspond	uirement" Section of this inspection report, each listed inspection item may ; obligation as described in the body of the regulations. Please use the Chapter reference to obtain a detailed description of compliance requirements.	itations listed on this inspec-
of Waste Man tion report she tion. Violations Additional not	reference to obtain a detailed description of compliance requirements.  Ion report is official notification that a representative of the Department of Environment, inspected the above installation. The findings of this inspection are showered as a formal notification (Notice of Violation) of any violations which were ay also be discovered upon examination of the results of laboratory analyses and action may be forthcoming, concerning any violations indicated herein and listops not constitute an order or other appealable action of the Department. Not	vn in this report. This inspec- observed during the inspec- eview of Department records. Ing any additional violations.
deemed to gra Signature	or imply immunity from legal action for any violation noted herein.  If the person interviewed does not neccessarily imply concurrence with the first the person was shown the report or that a copy was left with the person.	
Person Interviewed (sign	Aure) Cast Co	Date 2/7/89
Inspector (signature)	(falufakue lum)	Date <u>2/2/89</u>
3		Page of

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#### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

## Inspection Report Comments

Date of Inspection	2/7/89	Identification Number 221	980.830 563
	te Name Comm. WOOD PRES		
- 7 h 15	Shipment Should H.	AVE BEEN	MANIFEGTER
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ka	PERS CO PAD 108 060	634/	
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	EMELLE AL ALD 000 GZZ 461	4	
	/	/	
its correspond tion report as This insp of Waste Mai tion report sh tion. Violation Additional no This repo deemed to ga	quirement" Section of this inspection report, early obligation as described in the body of the regular reference to obtain a detailed description of continuous conti	Ilations. Please use the Chapter ompliance requirements. Itative of the Department of Endings of this inspection are shiften) of any violations which we esults of laboratory analyses and plations indicated herein and line action of the Department. No violation noted herein.	ironmental Resources, Bureau wn in this report. This inspecte observed during the inspecteview of Department records. ting any additional violations. Thing contained herein shall be dings on this report, but does
Person Interviewed (sign			2/2/09
Inspector (signature)	le la les le m		Date 2/2/07
			Page 4 of 4

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Onmonwealth Wood
Preservers, Inc. Meds ID
number.

MESSAGE

Pennsylvania Department of Environmental Resources

#### BUREAU OF SOLID WASTE MANAGEMENT

NUTUR ATRUN OF BAZARDOUS WASTE ACTIVITY

DEC 15 1983

I INSTALLATION'S EPA LO. NUMBER	UN EPA 6
PA DPS 083 0963	O.S. EPA, Region III
Commonwealth Wood Preservers, Inc.	
ITT INSTALLATION MAILING AGORESS	
STREET OR P. O. HOE	SEE SECTION OF SECTION
P.O. Box 57	
CITY OR YOUR	ST. IN CODE
Morrisville	P A 19067
IV. LOCATION OF INSTALLATION	MUNICIPALITY
400 Rock Run Road	Falls Township
CHTY OR YOUNG ST. ESP C	
Fairless Hills P A 19030	Bucks
V INSTALLATION CONTACT	
NAME AND TYPE (INC. SINC. & JID 1994)	B D 4 2 4 7 3 6 2 3
Davis, Jefferson E. III Vice President/Operations	pp   4H 2  4  / H3  6  2  1
A. NAME OF METALLATION'S LIGHT O	min (Carlotte)
Millard M. Davis, President	WIE GEDWEI
8. TYPE OF OWNERSHIP	
F - FEDERAL M - NON-FEDERAL M	DEC 1 2 1983
	JUL UI
VII SIC CODES (6-digit in order of priority)  A. FIRST	C,THIRD
2 4 9 1 Security Wood Preserving	W.
B. SECOND	O. FOURTH
(atmir)	
VIII TWYE OF HAZARDOUS BASTS ACTIVITY	
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D. DISPOSE D. PERSON BY MULE	N. OTHER (QUARTY):
IX MODE OF TRANSPORTATION (rungspring antis)	Trees (genity):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS	Trees (Bearly)
A. NIPOLE (Discharges to Surface Wester) . D. FED (Air Emissions from Proposed Straining	THE RESERVE OF THE PARTY OF THE
B. USC (Challespround Injurials of Fileful E. SOLID WASTE	
C: RICRA (Harandras Wastes) F. OTHER	Specify)
XI. TYPE OF NOTIFICATION,	
Mark "X" in appropriate box to indicate whether this is your franclation's first notification of general information, herarchica meete handled, of herarchica meete activity. If you check B, C, D, TyCouts.	of frecertious weste activitie, or restification of a change of E, or F, attach a letter of explanation (SEE INSTRUC-
A. FIRST NOTIFICATION . C. DELETION OF A WASTE . D. ADDITION OF A WASTE	E. DELETION OF AN ACTIVITY

XX DESCRIPTION OF HAZARDOUS WASTES (Consinue) from front							
A HAZARDOUS MASTES FROM NON-SPECIFIC SOURCES. Error the four-digit number from \$75,261(b)(2) for such listed hazardone meets.  Soon non-specific sources your installation handjus. Use additional should 17 necessary.							
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Event the four-digit minder from \$75,251(h)(3) such field herendous waste from specific budgeted asserted year installation handles. Use additional aborts if minerally.							
13 14 15 15 15 15 15 15 15 15 15 15 15 15 15							
C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS BASTES. Even the four-digit number from \$75.251(b)(4) for each chamical solutions.  Your installation handles which may be a hoserdoor waste. Use additional shares if recovery.							
31 32 39 39 41 42 39 49 49 49 49 49 49 49 49 49 49 49 49 49							
D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the busine corresponding to the observation of non-flowed heater-during source poor installation handles. (See \$75.291(g)(2) through (\$2))  1. IGNITABLE 2. CORROSIVE 2. REACTIVE 4. EP TOXIC							
XIII CERTIFICATION							
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached obscurrents, and that been on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.							
AND E DAVIS DE DAVIS DE 12/8/83							

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Department of Environmental Resources
Bureau of Solid Waste Management
Division of Hazardous Waste Management
P.O. Box 2063
Harrisburg, Pennsylvania 17120

E DECLISION OF THE POSTAGE

Joan Henry PA/W. Va Branch U.S. E. PA. Walnut Sts Phila, Pa 19100

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#### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

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P.O.Bo:
Morris

PAD 98 083 0863

Jefferson Davis, Vice Pres Commonwealth Wood Preservers Inc P.O.Box 57 Morrisville, PA 19067

400 Rock Run RD Fairless Hills, PA 19030

EPA Form 8700-12B (4-80)

INSTALLATION ADDRESS

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